

1 Joseph R. Manning, Jr. (SBN 223381)
2 DisabilityRights@manninglawoffice.com
2 **MANNING LAW, APC**
3 20062 SW Birch Street, Suite 200
3 Newport Beach, CA 92660
4 Tel: 949.200.8755 / Fax: 866.843.8308

5 Attorneys for Plaintiff:
6 GEORGE AVALOS

7 Bruce A. Neilson (SBN 096952)
8 **BRUCE A. NEILSON, ATTORNEY**
9 7108 N. Fresno St. #410
Fresno, California 93720
Telephone (559) 432-9831
Facsimile (559) 432-1837
Email: bneilsonlaw@gmail.com

12 Attorneys for Defendant
13 VIRK PROPERTIES, INC.

14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA**

17 GEORGE AVALOS, an
18 individual,

19 Plaintiff,

20 v.

22 VIRK PROPERTIES, INC.,
23 a California corporation; and
DOES 1-10, inclusive,

24 Defendants.

Case No.: 1:20-cv-01601-NONE-EPG

Hon.

**JOINT STIPULATION FOR
DISMISSAL OF THE ENTIRE
ACTION WITH PREJUDICE**

Complaint Filed: November 13, 2020
Trial Date: None

TO THE COURT AND ALL PARTIES:

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff GEORGE AVALOS (“Plaintiff”) and VIRK PROPERTIES, INC. (“Defendant”), stipulate and jointly request that this Court enter a dismissal with prejudice of Plaintiff’s Complaint in the above-entitled action, in its entirety. Each party shall bear his or its own attorneys’ fees, expert fees, and costs.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: February 11, 2021

MANNING LAW, APC

By: /s/ Joseph R. Manning, Jr.
Joseph R. Manning, Jr.
Attorney for Plaintiff
George Avalos

DATED: February 11, 2021

BRUCE A. NEILSON, ATTORNEY

By: /s/ Bruce A. Neilson
Bruce A. Neilson
Attorneys for Defendant
Virk Properties, Inc.

Certification Pursuant to Local Rule 5-4.3.4(a)(2)(i)

Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Joseph R. Manning, Jr., hereby do attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

DATED: February 11, 2021

By: /s/ Joseph R. Manning, Jr.